



December 16, 2016

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Ex Parte Presentation; Assessment and Collection of Regulatory Fees for
Fiscal Year 2016, MD Docket No. 16-166**

Dear Ms. Dortch:

On Dec. 14, 2016, Ross J. Lieberman, Senior Vice President of Government Affairs, American Cable Association (“ACA”), Elizabeth Cuttner, Cinnamon Mueller, and the undersigned, representing ACA, met with Mika Savir, Enforcement Bureau, and Roland Helvajian and Thomas Buckley, Office of the Managing Director, to discuss raising the Commission’s fee level for Direct Broadcast Satellite (“DBS”) to a level commensurate to that paid by other payors in the Cable/IPTV fee category, consistent with previous filings that ACA has made. In addition, we discussed mechanisms for easing the regulatory fee burden on the Commission’s smallest fee payors, including cable/IPTV providers, also consistent with ACA’s prior filings, such as (i) raising the revenues-based *de minimis* threshold and exempting the smallest cable/IPTV providers from the Cable/IPTV regulatory fee category; and (ii) adopting a progressive fee for the Cable/IPTV fee category that utilizes graduated rates that takes account of the payor’s ability to pay.¹

DBS Fee Levels

During the meeting, representatives for ACA urged the Commission to follow through on its commitment to update fees paid by DBS providers as necessary to ensure an appropriate level of regulatory parity and in consideration of these multichannel video programming distributors’ (“MVPDs”) use of Media Bureau resources.² ACA representatives noted that DBS operators receive numerous regulatory benefits from the activities of the Media Bureau. While cable, IPTV and DBS providers are not regulated identically, they offer similar multichannel video services, participate in the same proceedings at the same level in terms of the number of filings and meetings, and benefit in a similar fashion from Media Bureau regulation of MVPDs.³ The Commission itself has found that the

¹ *Assessment and Collection of Regulatory Fees for Fiscal Year 2016*, Report and Order, 31 FCC Rcd 10339 (2016) (“FY 2016 Order”); *Assessment and Collection of Regulatory Fees for Fiscal Year 2016*, Notice of Proposed Rulemaking, MD Docket No. 16-161, Comments of the American Cable Association (filed June 20, 2016) (“ACA Comments”); *Assessment and Collection of Regulatory Fees for Fiscal Year 2016*, Notice of Proposed Rulemaking, MD Docket No. 16-161, Comments of the American Cable Association (filed Jul. 5, 2016) (“ACA Reply Comments”).

² FY 2016 Order, ¶ 25.

³ See ACA Comments at 3-8; ACA Reply Comments at 3, 6-9, 11. In the time since ACA filed reply comments in the above docket in early July, AT&T, on behalf of DirecTV, has submitted an additional 41 filings and DISH has submitted an additional 19 filings in Media Bureau proceedings (see attached). ACA also noted that new Media Bureau rulemakings initiated after September of this year will likely attract roughly equal levels of

Media Bureau increasingly devotes its time to issues involving the entire MVPD industry.⁴ Because there is a relatively small difference from an MVPD regulatory perspective between cable, IPTV, and DBS, and because these providers impose similar burdens on the Media Bureau, the Commission should assess regulatory fees on DBS operators at the same rate as cable operators and IPTV providers.⁵ That is, all payors in the Cable/IPTV fee category should pay the same per subscriber rate in terms of fee level for FY 2017. As noted in ACA's previous filings, the two DBS providers have been on notice since 2015 that the initial fee level assessed would be subject to adjustment in future years.⁶

ACA maintained that there is no policy or practical reason to continue to only raise DBS fees incrementally rather than moving them immediately and reaching full parity for FY 2017. Doing so would recognize the fact that all MVPDs use Media Bureau full time equivalent employee ("FTE") resources at roughly the same level. ACA has calculated that if the Commission were to take that step, the parity fee for all MVPDs would be around \$0.75 per subscriber per year or six cents per month.⁷

ACA reiterated its view that the DBS providers' traditional claims of "rate shock" and harm to DBS subscribers if the fee is increased to full parity levels have been and remain unwarranted.⁸ AT&T/DirecTV and DISH are financially secure enough to handle a relatively modest fee increase from \$0.24 (with a \$0.03 facilities reduction and relocation fee added, bringing the total to \$0.27 per subscriber per year) to \$0.75 per subscriber per year, whether the fee is passed through in whole or part or assumed as a cost of doing business. Based upon an average video revenue per unit ("ARPU") per month of \$118.09 for AT&T/DirecTV and \$89.44 for DISH, updated as of Q3 2016, an adjusted fee of approximately six cents per month per subscriber would represent an increase of five one-hundredths (.05%) of a percent for AT&T/DirecTV and six one-hundredths (.06%) of a percent for DISH.⁹ In fact, AT&T recently announced that it will increase the prices of eight of its nine DirecTV

participation by cable/IPTV and DBS providers as they will affect all MVPDs equally. See Promoting the Availability of Diverse and Independent Sources of Video Programming, Notice of Proposed Rulemaking, 31 FCC Rcd 11352 (2016); Joint Petition for Rulemaking of America's Public Television Stations, the AWARN Alliance, the Consumer Technology Association, and the National Association of Broadcasters, *Authorization of Next Generation TV For Permissive Use as a Television Standard*, GN Docket No. 16-142 (filed Apr. 13, 2016); *Media Bureau Seeks Comment on Joint Petition for Rulemaking of America's Public Television Stations, The AWARN Alliance, The Consumer Technology Association, and The National Association of Broadcasters Seeking to Authorize Permissive Use of the "Next Generation TV" Broadcast Television Standard*, Public Notice, 31 FCC Rcd 3858 (2016).

⁴ *Assessment and Collection of Regulatory Fees for Fiscal Year 2015*, Notice of Proposed Rulemaking, Report and Order, and Order, 30 FCC Rcd 5354, ¶¶ 33-34 (2015) ("FY 2015 Order and NPRM").

⁵ This is the approach taken by the Commission with respect to fee payors included within the Interstate Telecommunications Service Provider ("ITSP") fee category – despite some differences in the level and type of regulation applied to each wireline provider, all are assessed fees based on the same percentage of revenues. ACA Comments at 12-15.

⁶ *Id.* at 10-11; ACA Reply Comments at 2-3, 11.

⁷ The exact fee would depend upon the Commission's calculations for FY 2017 regulatory fee revenues and its determination of the number of total subscribers for cable, IPTV, and DBS providers. ACA's estimate uses the \$73.38 million estimate for FY 2016 as the total DBS and Cable/IPTV regulatory fee revenues, and 98.2 million as the number of total subscribers to cable, IPTV, and DBS providers. See FY 2016 Order, Appendix B: Calculation of FY 2016 Revenue Requirements and Pro-Rata Fees.

⁸ See ACA Reply Comments at 14-15.

⁹ AT&T Financial and Operational Results: Q3 2016 AT&T Earnings, Oct. 22, 2016, at 13, *available at* http://www.att.com/Investor/Earnings/3q16/master_3q16.pdf; Press Release, DISH Network Reports Third

base packages by \$2 to \$6 per month, effective January 22, 2017.¹⁰ AT&T announced similar rate increases at this time last year.¹¹ AT&T's annual DirecTV rate increases indicate that it has little fear of subscriber "rate shock" and can easily pass through a relatively minimal regulatory fee increase to subscribers. Even if they did not want to pass this relatively modest fee increase through to subscribers, AT&T/DirecTV and DISH are large enough corporations to assume those fees themselves, with annual operating profits in the billions of dollars.¹²

Easing the Regulatory Fee Burden on the Commission's Smallest Fee Payors

Meeting participants discussed various approaches to providing relief to smaller entities, including an increase in the revenues-based *de minimis* threshold, exempting the smallest cable/IPTV providers from the Cable/IPTV regulatory fee category, and adopting an "ability-to-pay" principle in assessing Cable/IPTV regulatory fees implemented through gradations of fees based on differing levels of subscribership.

Raising the Revenues-Based De Minimis Threshold

ACA suggested that the Commission raise the revenues-based *de minimis* threshold to provide greater relief to smaller entities, exempting a greater number of them from paying any regulatory fees below that threshold.¹³ In 2014, the Commission considered raising the revenues-based *de minimis* threshold from \$10 to \$100, \$500 or \$1,000 to provide more relief to smaller entities and improve the cost effectiveness of the Commission's collection of regulatory fees.¹⁴ The Commission adopted the \$500 threshold at the time and pledged to consider further increasing the

Quarter 2016 Financial Results (Nov. 9, 2016), available at <http://about.dish.com/press-release/financial/dish-network-reports-third-quarter-2016-financial-results>.

¹⁰ Daniel Frankel, *DirecTV sets another January across-the-board price increase*, FIERCECABLE (Dec. 5, 2016, 11:11 AM), <http://www.fiercecable.com/cable/directv-sets-another-january-across-board-price-increase>.

¹¹ *Id.*

¹² Yahoo! Finance reports that DISH Network has a market cap of \$26.83 billion and AT&T Services Inc. has a market cap of \$242.45 billion. Yahoo! Finance, DISH Network Corporation (DISH), available at <https://finance.yahoo.com/quote/DISH/?p=DISH> (last visited Nov. 29, 2016); Yahoo! Finance, AT&T Inc. (T), available at <https://finance.yahoo.com/quote/T?ltr=1> (last visited Nov. 29, 2016). AT&T's reported revenue for the first nine months of 2016 is \$104.68 billion, with an operating profit of \$17.25 billion through Sept. 1, 2016. AT&T Financial and Operational Results: Q3 2016 AT&T Earnings, Oct. 22, 2016, at 8, available at http://www.att.com/Investor/Earnings/3q16/master_3q16.pdf. DISH's reported revenue for the first nine months of 2016 is \$11.37 billion, with an annual operating profit of \$1.33 billion in 2015. Press Release, DISH Network Reports Third Quarter 2016 Financial Results (Nov. 9, 2016), available at <http://about.dish.com/press-release/financial/dish-network-reports-third-quarter-2016-financial-results>; DISH Network Annual Report 2015, Mar. 22, 2016, at 55, available at http://files.shareholder.com/downloads/DISH/3329280508x0x883714/62FF4F04-C74D-4BCE-ABB1-26FDDF45F7E9/2015_Annual_Report_-_Webpost.pdf.

¹³ See *Assessment and Collection of Regulatory Fees for Fiscal Year 2014*; *Assessment and Collection of Regulatory Fees for Fiscal Year 2013*; *Procedures for Assessment and Collection of Regulatory Fees*, Notice of Proposed Rulemaking, Second Notice of Proposed Rulemaking, and Order, MD Docket Nos. 14-92, 13-140, 12-201, Comments of the American Cable Association (filed Jul. 7, 2014) ("ACA FY 2014 Comments").

¹⁴ *Assessment and Collection of Regulatory Fees for Fiscal Year 2014*; *Assessment and Collection of Regulatory Fees for Fiscal Year 2013*; *Procedures for Assessment and Collection of Regulatory Fees*, Notice of Proposed Rulemaking, Second Notice of Proposed Rulemaking, and Order, 29 FCC Rcd 6417, ¶¶ 31-32 (2014).

threshold.¹⁵ Another modest increase to this *de minimis* threshold would offer relief for more entities who use few administrative resources and are often disproportionately burdened by regulations and regulatory fees. It would also further reduce the Commission's administrative costs related to collecting regulatory fees.

Exempting the Smallest Cable/IPTV Providers from the Cable/IPTV Regulatory Fee Category

In the Commission's 2014 Report and Order, the Commission also promised to consider adopting a threshold based upon the number of cable and IPTV subscribers as suggested by ACA, or revise the threshold based upon some other basis.¹⁶ ACA reiterated its previous recommendation that the Commission exempt the smallest cable operators from paying any Cable/IPTV regulatory fees.¹⁷ ACA noted that for the smallest MVPDs, the pay-TV business model is increasingly tenuous with small and eroding margins, if any margins at all, and declining subscriber counts. ACA noted that hundreds of small systems have closed over the past few years, and more are expected to close in the future. ACA explained that extending relief from payment of regulatory fees to the smallest cable/IPTV providers would have a truly *de minimis* impact on collections for the Commission, but may contribute to the difference between staying in business or shuttering the system for the affected operators and the small and rural communities they serve.

The Commission has repeatedly acknowledged that, within the MVPD industry, cable operators serving fewer than 1,000 subscribers generate the lowest administrative burdens for the Media Bureau. Because of the wide variety of exemptions that apply to systems of cable operators serving fewer than 1,000 subscribers,¹⁸ these operators impose fewer burdens on, and receive fewer benefits from, the Media Bureau. Moreover, they rarely ever directly participate in proceedings administered by the Media Bureau. Accordingly, exempting cable/IPTV providers serving fewer than 1,000 subscribers from the Cable/IPTV fee category would be consistent with other exemptions the Commission has created for these operators, and would serve similar purposes.

Ability to Pay

ACA reiterated its proposal, first introduced in 2013, that the Commission consider adopting an "ability-to-pay" principle in assessing regulatory fees implemented through gradations of fees

¹⁵ *Assessment and Collection of Regulatory Fees for Fiscal Year 2014; Assessment and Collection of Regulatory Fees for Fiscal Year 2013; Procedures for Assessment and Collection of Regulatory Fees*, Report and Order and Further Notice of Proposed Rulemaking, 29 FCC Rcd 10767, ¶ 20 (2014).

¹⁶ *Id.*

¹⁷ See ACA FY 2014 Comments at 9-13.

¹⁸ See, e.g., 47 C.F.R. §§ 76.95(a), 76.106(b) (network non-duplication and syndicated exclusivity rules do not apply to cable systems serving fewer than 1,000 subscribers); 47 C.F.R. § 76.601(d) (proof-of-performance testing exception for cable systems having fewer than 1,000 subscribers); 47 C.F.R. § 76.605 NOTE 1 (local franchise authorities of cable systems serving fewer than 1,000 subscribers may adopt less stringent technical standards); 47 C.F.R. § 76.1111 (cable systems serving fewer than 1,000 subscribers are exempt from the requirement to keep a record of each test and activation of the Emergency Alert System procedures for three years); 47 C.F.R. § 1700(a) (the operator of every cable system having fewer than 1,000 subscribers is exempt from the public inspection requirements contained in sections 76.1701 (political file), 76.1702 (EEO records), 76.1703 (commercial records for children's programming), 76.1704 (proof-of-performance test data), 76.1706 (signal leakage logs and repair records), and 76.1715 (sponsorship identification); 47 C.F.R. § 76.1714(b) (cable systems serving fewer than 1,000 subscribers do not have to keep a current copy of the part 76 rules or an EAS Operating Handbook).

based on differing levels of subscribership.¹⁹ A regulated entity's ability to pay varies with its size, and the Commission's regulatory fees are particularly burdensome for smaller operators serving low-density areas in smaller and rural markets and lacking benefits of economies of scale. ACA discussed its recommendation that the Commission adopt a progressive regulatory fee structure for cable/IPTV.

When introducing the concept, ACA composed the following chart using data obtained from NCTC and SNL Kagan from February 2013 as a representative breakdown of cable operators paying regulatory fees on a per cable subscriber basis, which ACA believes continues to represent a roughly accurate picture of the entire universe of cable operators and IPTV Providers.²⁰

Cable Subscriber Bracket	Number of Companies	Aggregate Subscribers	% of Total Cable Subscribers
Under 5,000	719	870,367	1.41%
5,000-49,999	140	1,864,806	3.03%
50,000-399,999	23	2,870,610	4.66%
400,000-999,999	3	2,154,811	3.50%
More than 1,000,000 ²¹	8	53,881,407	87.41%
Total	893	61,642,001	100.00%

Under a progressive regulatory fee structure, the cable fees would be set on a graduated scale, with fee categories supported by all cable/IPTV providers containing rates on a per-subscriber basis. The level of rates would gradually increase based upon the number of subscribers, starting with a relatively low rate per subscriber, and increasing in set increments, so that operators with the largest number of subscribers, and therefore greatest ability to pay, would pay a higher effective rate than operators with fewer subscribers and the least ability to pay.²² Such an approach would create

¹⁹ *Procedures for Assessment and Collection of Regulatory Fees; Assessment and Collection of Regulatory Fees for Fiscal Year 2008*, Letter from Barbara S. Esbin, Counsel to American Cable Association, to Marlene Dortch, Secretary, FCC, MD Docket Nos. 12-201 and 08-65, at 4-5 (filed Feb. 22, 2013).

²⁰ Data as of February 2013. The data was obtained by ACA from NCTC on Feb. 21, 2013. SNL Kagan, *Top Cable MSOs*, Period: 09/12 Q, <http://www.snl.com/InteractiveX/TopCableMSOs.aspx?period=2012Q3&sortcol=subscribersbasic&sortorder=desc> (last accessed Feb. 22, 2013). The chart does not include AT&T based upon ACA's understanding at the time that the company did not pay regulatory fees for benefits received from the Media Bureau because it considered itself an MVPD but not a cable operator.

²¹ As of Feb. 2013, cable operators with more than 1,000,000 subscribers include: Comcast, Time Warner Cable, Verizon, Cox, Charter, Cablevision, Bright House Networks, and Cequel d/b/a SuddenLink. Subsequently, Charter has merged with Time Warner Cable and Bright House Networks, and Altice has purchased Cablevision and SuddenLink.

²² Based upon ACA's chart, the following illustrates a possible regulatory fee rate schedule:

- i. The lowest per subscriber regulatory fee rate would apply to an MVPD's first 5,000 MVPD subscribers;
- ii. A higher per subscriber regulatory fee rate would apply to an MVPD's next 5,000 to 49,999 MVPD subscribers;
- iii. An even higher per subscriber regulatory fee rate would apply to an MVPD's next 50,000 to 399,999 MVPD subscribers;

a fair and relatively simple fee structure that takes appropriate account of the greater ability of the relatively small number of large cable operators who together serve nearly 90 percent of cable subscribers, while affording meaningful relief to the hundreds of smaller operators serving the fewest number of subscribers. The Commission has implemented similar graduated fee structures, such as the market tiered structure for digital TV stations,²³ the capacity-based structure for submarine cable providers,²⁴ and the population served-based structure for radio stations.²⁵

This letter is being filed electronically pursuant to section 1.1206 of the Commission's rules.

Sincerely,



Barbara Esbin

Attachment (3)

cc: Mika Savir
Roland Helvajian
Thomas Buckley

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- iv. The second highest per subscriber regulatory fee rate would apply to an MVPD's next 400,000 to 999,999 MVPD subscribers; and
 - v. The highest per subscriber regulatory fee rate would apply to an MVPD's subscribers above 1,000,000.

²³ Digital TV stations pay a graduated fee rate based upon market size. Stations in the top ten markets are assessed a \$60,675 fee; stations in markets 11-25 are assessed a \$45,675 fee; stations in markets 26-50 are assessed \$30,525; stations in markets 51-100 are assessed \$15,200; and stations in the remaining markets are assessed \$5,000. See FY 2016 Order, Appendix B: Calculation of FY 2016 Revenue Requirements and Pro-Rata Fees.

²⁴ Submarine cable providers' regulatory fees are assessed based upon their capacity, with systems offering capacity of 20 Gbps or greater paying significantly more than those with capacity ranging from less than 2.5 Gbps to 10-20 Gbps. See FY 2016 Order, Appendix C: FY 2016 Schedule of Regulatory Fees, International Bearer Circuits – Submarine Cable.

²⁵ AM and FM stations' regulatory fees are assessed based upon population served, and vary based upon the class of the station. See FY 2016 Order, Appendix C: FY 2016 Schedule of Regulatory Fees, FY 2016 Radio Station Regulatory Fees.

ATTACHMENT A

MVPD Filings in Media Bureau Since September 2015 (updated 12/1/16)

MVPD	MB Docket Totals	Topics of Filings
AT&T/DIRECTV	79 (27 in own merger docket)	Charter/TWC/BHN Merger; Totality of Circumstances Test; Amendment of the Commission's Rules Related to Retransmission Consent; STB Proposal; DSTAC Report; DirecTV/AT&T Merger; Promoting the Availability of Diverse and Independent Sources of Video Programming; Market Modification; Cable Special Relief Petitions; Multichannel Video Programming Distribution Services; CVAA; Post-Incentive Auction Transition; Video Competition Report
DISH	79	Charter/TWC/BHN Merger; Totality of Circumstances Test; Amendment of the Commission's Rules Related to Retransmission Consent; STB Proposal; DSTAC Report; Media General/Nexstar Merger; STELAR Feasibility Certification, Market Modification; Sun Broadcasting, Inc. Complaint Against OpticalTel Telecommunications, Inc. Concerning Retransmission of WXCW(TV), Naples, FL; Cable Special Relief Petitions
Comcast	53 (26 in own merger docket)	Charter/TWC/BHN Merger; STB Proposal; Comcast/NBCU Assignment and Transfer; Petition for Declaratory Ruling on Email Notices; Liberman Broadcasting, Inc. v. Comcast Corp.; Promoting the Availability of Diverse and Independent Sources of Video Programming; Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming
Time Warner Cable	36 (29 in own merger docket)	Charter/TWC/BHN Merger; Totality of Circumstances Test; Amendment of the Commission's Rules Related to Retransmission Consent; STB Proposal; Opposition to Must Carry Complaint filed by PMCM TV, LLC
Verizon	17	Charter/TWC/BHN; Totality of Circumstances Test; Amendment of the Commission's Rules Related to Retransmission Consent; STB Proposal; Promoting the Availability of Diverse and Independent Sources of Video Programming
Charter	82 (66 in own merger docket)	Charter/TWC/BHN Merger; Totality of Circumstances Test; STB Proposal; Petition for Declaratory Ruling on Email Notices
Cox Communications	14	STB Proposal; Media General/Nexstar Merger; Petition for Declaratory Ruling on Email Notices
Cablevision	7	Totality of Circumstances Test; Game Show Network, LLC v. Cablevision Systems Corp.
Bright House Network	15 (15 in own merger docket)	Charter/TWC/BHN Merger
Suddenlink	1	Petition for Declaratory Ruling on Email Notices
Mediacom	21	Totality of Circumstances Test; Amendment of the Commission's Rules Related to Retransmission Consent; STB Proposal

ATTACHMENT B

AT&T / DIRECTV Ex Parte Notices of Meetings Attended by Media Bureau Personnel (Sept. 2015 – present) (updated 12/1/16)

Name of Ex Parte Filer	Docket(s)	Date of Notice	Media Bureau Personnel in Attendance
AT&T	MB 16-42 and CS 97-80: STB Proposal	July 13, 2016	Brendan Murray
AT&T	MB 16-42 and CS 97-80: STB Proposal	July 8, 2016	Brendan Murray
AT&T	MB 16-42 and CS 97-80: STB Proposal	July 5, 2016	Mary Beth Murphy, Brendan Murray, Steven Broeckaert, Martha Heller, Lyle Elder
AT&T	MB 16-42 and CS 97-80: STB Proposal	May 24, 2016	Susan Singer, Kathy Berthot, Martha Heller, Calisha Myers, Mary Beth Murphy, Nancy Murphy
AT&T	MB 15-216: Totality of the Circumstances Test MB 10-71: Amendment of the Commission's Rules Related to Retransmission Consent	Mar. 16, 2016	Bill Lake, Michelle Carey, Martha Heller, Steve Broeckaert, Diane Sokolow, David Konczal, Calisha Myers
AT&T	MB 15-64: Media Bureau Seeks Comment on DSTAC Report	Jan. 13, 2016	William Lake, Michelle Carey, Mary Beth Murphy, Susan Singer, Nancy Murphy, Martha Heller, Brendan Murray, and Lyle Elder
AT&T	GN 12-268: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions	Dec. 18, 2015	Michelle Carey, Pam Gallant and Barbara Kreisman
AT&T	MB 15-149: Charter/TWC/BHN Merger	Nov. 16, 2015	Susan Singer
AT&T	MB 15-149: Charter/TWC/BHN Merger	Oct. 21, 2015	Susan Singer
AT&T	GN 12-268: Expanding the Economic and Innovation Opportunities of Spectrum through Incentive Auctions; AU 14-252: Broadcast Incentive Auction Comment Public Notice Auction 1000, 1001 and 1002	Sept. 21, 2015	Joyce Bernstein

ATTACHMENT C

DISH Ex Parte Notices of Meetings Attended by Media Bureau Personnel (Sept. 2015 – present) (updated 12/1/16)

Name of Ex Parte Filer	Docket(s)	Date of Notice	Media Bureau Personnel in Attendance
DISH	MB 16-57: Nexstar-MEG Merger	Nov. 1, 2016	William Lake, Mary Beth Murphy, Susan Singer, Barbara Kreisman, David Brown, Jeremy Miller
EchoStar and DISH	MB 16-42 and CS 97-80: STB Proposal	Sept. 19, 2016	Mary Beth Murphy, Brendan Murray, Martha Heller, Lyle Elder
DISH	MB 16-57: Nexstar-MEG Merger	Aug. 4, 2016	Bill Lake, Mary Beth Murphy Susan Singer, David Brown, Alex Armbruster
EchoStar and DISH	MB 16-42 and CS 97-80: STB Proposal	June 8, 2016	Bill Lake, Mary Beth Murphy, Michelle Carey, Nancy Murphy, Susan Singer; Martha Heller, Brendan Murray, Maria Mullarkey, Kathy Berthot, Lyle Elder; Andrew Manley, Kelsie Rutherford, Arian Attar, and Anne Russell
DISH	MB 15-149: Charter/TWC/BHN Merger	Feb. 26, 2016	William Lake, Hillary DeNigro, Brendan Holland, Ty Bream, Julie Saulnier, Jamila Bess Johnson, Alexis Zayas, and Eugene Kiselev
DISH	MB 15-149: Charter/TWC/BHN Merger	Feb. 12, 2016	Julie Saulnier, Hillary DeNigro, Ali Zayas, Ty Bream, Jessica Campbell, Mitali Shah, Jamila Bess-Johnson, Susan Singer, and Eugene Kiselev
EchoStar and DISH	MB 15-64: Final Report of the DSTAC	Jan. 14, 2016	Bill Lake, Michelle Carey, Nancy Murphy, Susan Singer, Mary Beth Murphy, Brendan Murray, Martha Heller, and Lyle Elder
DISH	MB 15-149: Charter/TWC/BHN Merger	Dec. 2, 2015	William Lake, Hillary DeNigro, Ty Bream, Jamila Bess Johnson, Alexis Zayas, Julie Saulnier, and Mitali Shah
DISH	MB 15-149: Charter/TWC/BHN Merger	Nov. 6, 2015	William Lake, Susan Singer, Hillary DeNigro, Jessica Campbell, Ty Bream, Jamila Bess Johnson, Christopher Clark, Mitali Shah, and Julie Saulnier